IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA

EDWARD P. BOWERS, Plaintiff, v. COVENTRY HEALTH CARE OF THE CAROLINAS, INC., Defendant.	CASE NO. 3:17-CV-00023 **CERTIFICATION AND REPORT OF F.R.C.P. 26(F) CONFERENCE AND DISCOVERY PLAN**

1. Certification of Conference. Pursuant to Fed. R. Civ. P. 26(f), a meeting was held on March 21, 2017, by telephone, and was conducted by counsel for the designed parties in the above-captioned case.

2. Pre-Discovery Disclosures. The information required by Fed. R. Civ. P. 26(a)(1) will be exchanged by April 30, 2017.

3. Discovery Plan. The parties jointly propose to the court the following discovery plan:

a. All discovery shall be commenced in time to be completed by June 2, 2017. Defendant will produce the administrative record on or before May 1, 2017.

b. Discovery Limits:

1. No interrogatories by either party.

2. No requests for admission by either party.

3. No depositions by either party.

4. Plaintiff reserves his right to seek discovery beyond the administrative record at a later date

c. Neither party anticipates retaining expert witnesses at this time.

4. Other Items.

a. The parties do not request a conference with the court before entry of the scheduling order.

b. All potentially dispositive motions should be filed by July 31, 2017.

c. At this point, parties cannot say whether settlement is likely. Parties agree that settlement chances may be enhanced through a Mediated Settlement Conference after the completion of discovery.

d. Final lists of witnesses and exhibits under Rule 26(a)(3) are due.

From plaintiff by September 15, 2017.

From defendant by September 22, 2017.

e. If the case is ultimately tried, trial is expected to take approximately 2 days.

f. The parties have discussed the issue of consent to the jurisdiction of magistrate judge. (Consent not given.)

5. Please identify any other matter regarding discovery or case management which may require the Court's attention (e.g., concerns re: confidentiality, protective orders, etc., unmovable scheduling conflicts)

Plaintiff's counsel has an unmovable commitment from June 15-23, 2017.

Dated: March 28, 2017

*/s/ Michael T Bowers*____
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CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of March, 2017, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, and I have served the following CM/ECF participants:

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/s/ David N. Allen
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Attorney for Defendant